

# Haringey Local Plan Strategic Environmental Assessment Post-Adoption Statement

## 1. Background

- 1.1. Haringey's Local Plan comprises a suite of Development Plan Documents (DPDs) including the Strategic Policies Local Plan (consolidated with alterations since 2017), Development Management DPD, Site Allocations DPD and the Tottenham Area Action Plan (AAP). The Local Plan was adopted by Haringey Council on 24<sup>th</sup> July 2017.
- 1.2. The Local Plan was developed over several stages in consultation with statutory consultation bodies, the Mayor of London, adjoining boroughs, landowners, key stakeholders and the wider community. In parallel with the development of the Local Plan a Sustainability Appraisal (SA) was undertaken. This incorporated a Strategic Environmental Assessment (SEA) as required by the SEA Regulations<sup>1</sup>.
- 1.3. Sustainability Appraisal aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes. Strategic Environmental Assessment aims to predict and assess the environmental effects that are likely to arise from plans. It is a process for assessing and mitigating the adverse environmental impacts of specific plans and policies.

## 2. Purpose of the SEA adoption statement

- 2.1. SA/SEA is undertaken as a series of stages in line with the requirements of the SEA Regulations and national planning guidance. The final step in the process involves the publication of a 'post adoption statement' following the formal adoption of the Local Plan. In accordance with Regulation 16 this statement sets out the following:
  - How environmental considerations have been integrated into the plan;
  - How the environmental report has been taken into account;
  - The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with;
  - How opinions expressed in response to public consultation have been taken into account;
  - The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

---

<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

2.2. This report addresses each of the above matters. Whilst the remainder of the report is divided into sections for practical reasons, it is acknowledged that there is some overlap on matters throughout these sections. The report should therefore be considered in its entirety for purposes of satisfying the relevant statutory requirements on post-adoption statements.

### 3. How environmental considerations have been integrated into the plan

3.1. SA/SEA was completed over a series of stages in parallel with the plan production process. Sustainability considerations have been incorporated as an iterative process where SA/SEA has informed each stage of the development of policy, as summarised in the following table:

SEA stage	Strategic Policies Alterations	Development Management	Site Allocations	Tottenham AAP
Scoping	First undertaken in Jan 2007 then reviewed in line with SEA scoping for other plans	Jul 2012	Mar 2014	Mar 2014
Pre-submission	Feb 2015	Mar 2013 and Feb 2015	Feb 2015	Feb 2015
Publication	Jan 2016	Jan 2016	Jan 2016	Jan 2016
Examination (Appraisal of the Main Modifications)	Nov 2016	Nov 2016	Nov 2016	Nov 2016

3.2. An SA/SEA Scoping Report was first prepared in January 2007 to help inform production of Haringey's Strategic Policies Local Plan (2013). This report established the overall SA/SEA framework for Haringey's Local Plan. As this framework was found to have met the relevant statutory requirements through the public examination process it was used as the basis for future scoping exercises on the subsequent Local Plan documents. It was also used to help ensure consistency of approach across the Local Plan as much as possible. The original SA/SEA framework was reviewed and refined in the light of consultation responses received on Scoping Reports published in July 2012 and March 2014 although its overall objectives remained consistent throughout.

3.3. For all of the Local Plan documents the SA/SEA Scoping Reports helped to inform the setting of the SEA Framework, which comprised a list of environmental, social and economic objectives under themed topic areas against which the Local Plan and its policies were assessed throughout its preparation. The current SEA Framework is included as Appendix A to this report for information.

- 3.4. A full draft SA/SEA was prepared and published alongside 'pre-submission' (Regulation 18) 'preferred approach' versions of the Local Plan documents in February 2015. This provided a comprehensive assessment of the draft Local Plan including consideration of reasonable alternatives for strategic policy issues. The findings helped to inform a review and further revisions to the plans. The SA/SEA was then amended to take account of these changes and published alongside 'publication' (Regulation 19) versions of the Local Plan documents in January 2016. These SA/SEA reports were then submitted to the Secretary of State for examination (Regulation 22) along with the Local Plan in May 2016.
- 3.5. Through the public examination process a number of policy modifications were recommended to ensure the Local Plan met the tests of soundness for local development documents. These modifications had not yet been through the SA/SEA process. An SA/SEA Addendum was therefore prepared to ensure due consideration was given to sustainability issues throughout the entirety of the plan process.

#### **4. How the environmental report has been taken into account**

- 4.1. SA/SEA has been undertaken as an iterative process to ensure that sustainability considerations have guided the plan making process. Policies have been developed in respect of both the SEA Framework and the Local Plan's "strategic objectives" (as set out in Section 1.5 of the Strategic Policies), both of which put sustainability considerations at the heart of decision making. The SA/SEA process has been particularly important in informing approaches in the light of reasonable alternatives on locally specific strategic policy matters. It has also helped identify the wider sustainability implications of the Local Plan, providing a basis from which to consider policy refinements and also reinforcing how the plan will contribute to achievement of sustainable development in the Borough.
- 4.2. Full details of how the findings of each of the SA/SEA Reports were taken into account in the development of the policies can be found within the SA/SEA Reports (publication version) and the SA/SEA Addendum.
- 4.3. The Planning Inspector's Report on the Local Plan (paragraph 1.38) provides that the relevant requirements in respect of SEA/SA were satisfied through the plan process.

## **5. The reasons for choosing the Plan as adopted, in light of reasonable alternatives dealt with**

- 5.1. As noted above, one of the key elements in the SA/SEA process was the consideration of 'reasonable alternatives' on strategic policy matters. The Local Plan was developed having regard to these alternatives, and in light of SA/SEA findings, the Council considers that the plan will direct development in a sustainable manner over the plan period. This was supported by the Planning Inspector.
- 5.2. On many policy areas the Local Plan documents were given to be taking a lead from and helping to give effect to higher level policies, including those in the London Plan and the adopted Strategic Policies (2013). It was therefore not considered necessary to consider alternatives on every policy. However, there were key strategic policy areas where reasonable alternatives were considered and these are summarised for each of the plans in further detail below.

### **Alterations to Strategic Policies**

- 5.3. The Alterations to Strategic Policies were considered in response to a number of changes in the overarching planning framework for Haringey. This included the revised strategic housing and employment requirements for the Borough as set out in the London Plan, which reflected a significant uplift in planned growth in these areas. Several alternatives were therefore considered for managing the distribution of this growth (i.e. spatial strategy). The appraisal of these alternatives helped inform the preferred approach – the existing spatial strategy refined with updates to selected Growth Areas and Areas of Change – and giving assurance that this alternative would likely result in significant positive effects on a range of sustainability topics, as well as scoring comparably better than the other options considered.
- 5.4. Further information on how consideration of reasonable alternatives influenced the Alterations to Strategic Policies is set out in Part 1 of the corresponding Sustainability Appraisal Report (publication version).

### **Development Management DPD (DMDPD)**

- 5.5. The DMDPD was set having regard to the need to give effect to higher level strategic policies. The scope for consideration of reasonable alternatives was therefore limited by the strategic planning framework. However, there were still a number of policy topic areas for which different options were considered, as follows:
  - Residential conversions
  - Residential density and design
  - Employment density
  - Mixed-use employment led development
  - Town centre development

- Clustering of uses (hot food takeaways and betting shops)
  - Siting and design of tall buildings
  - Protection of views and vistas
  - Heritage and conservation
  - Car-free and car-capped development
  - Carbon management
  - Community infrastructure provision
  - Open space provision
- 5.6. The appraisal of alternative options helped inform the preferred policy approaches that were progressed in the DMDPD, also giving assurance of their likely beneficial effects on sustainability objectives. Where recommendations were made at the interim stage of the SA/SEA process (i.e. pre-submission) the plan was modified or refined to address particular sustainability issues and objectives.
- 5.7. Further information on how consideration of reasonable alternatives influenced the DMDPD is set out in Part 1 of the corresponding Sustainability Appraisal Report (publication version).

#### **Site Allocations DPD (SADPD)**

- 5.8. The SADPD helps give effect to the Strategic Policies and includes a number of strategic land use designations and site allocations necessary to meet housing and employment needs, along with other land uses, to support sustainable development. In the early stages of the plan preparation process consideration of reasonable alternatives focussed on the preferred package of sites to be included in the plan. This was a multi-stage process involving the identification of a long list of sites, site screening and selection of potentially appropriate uses for these sites. Following this initial exercise, the SA/SEA focussed on assessing reasonable alternatives on broad topic issues, which was seen as a practicable means to help inform preferred approaches on specific sites. Alternatives were considered on four topic areas, as follows:
- Office development
  - Non-designated employment land
  - Haringey warehouse district
  - Open space provision
- 5.9. The appraisal of alternative options helped inform the preferred policy approaches that were progressed in the SADPD, also giving assurance of their likely beneficial effects on sustainability objectives. Where recommendations were made at the interim stage of the SA/SEA process (i.e. pre-submission) the plan was modified or refined to address particular sustainability issues and objectives.

- 5.10. Further information on how consideration of reasonable alternatives influenced the SADPD is set out in Part 1 of the corresponding Sustainability Appraisal Report (publication version).

### **Tottenham Area Action Plan (TAAP)**

- 5.11. The TAAP helps give effect to the Strategic Policies by setting out a detailed planning framework for Tottenham to support delivery of Haringey's spatial strategy. It includes strategic site allocation policies to help meet identified needs for housing and employment, along with other uses to support sustainable development, as well as locally specific development management policies.
- 5.12. Given the scope of the TAAP to deliver on the Council's strategic regeneration programme and facilitate a significant uplift in housing and jobs in the Tottenham area, it was considered appropriate to assess reasonable alternatives for the spatial distribution of this growth. The appraisal of alternatives helped to inform the spatial strategy for the plan, whilst also giving assurance that the preferred approach would likely result in significant positive effects across a range of sustainability objectives.
- 5.13. In addition to the spatial strategy, reasonable alternatives were considered on a selected number of development management policies for the TAAP. This is owing to the scope for the plan to explore more nuanced approaches than set out in the borough-wide policies of the DMDPD. There were four policy topic areas considered for the TAAP, as follows:
- Mixed-use employment led development
  - Town centre hierarchy (Tottenham Hale district centre option)
  - Building heights
  - Affordable housing
- 5.14. The appraisal of alternative options helped inform the preferred policy approaches that were progressed in the TAAP, also giving assurance of their likely beneficial effects on sustainability objectives. Where recommendations were made at the interim stage of the SA/SEA process (i.e. pre-submission) the plan was modified or refined to address particular sustainability issues and objectives
- 5.15. Further information on how consideration of reasonable alternatives influenced the SADPD is set out in Part 1 of the corresponding Sustainability Appraisal Report (publication version).

## 6. How opinions expressed in response to public consultation have been taken into account

- 6.1. As summarised in Section 3 of this statement, the Local Plan and corresponding SA/SEA have been subject to multiple rounds of public consultation with responses informing the preparation of both documents.
- 6.2. An SA/SEA Scoping Report was first published for consultation in 2007 with the statutory consultation bodies (Natural England, Environment Agency and Historic England). Responses to this consultation helped to inform the setting of the SA/SEA Framework for the Strategic Policies Local Plan (2013). As this framework was found to have met the relevant statutory requirements through the public examination process it was used as the basis for future scoping exercises on the subsequent Local Plan documents. It was also used to help ensure consistency of approach across the Local Plan as much as possible. The original SA/SEA framework was reviewed and refined in the light of consultation responses received on Scoping Reports published for the DMDPD in July 2012 and the SADPD and TAAP in March 2014, although its overall objectives remained consistent throughout
- 6.3. The Local Plan was subject to multiple rounds of ‘pre-submission’ (Regulation 18) consultation in order to explore potential issues and options on identified strategic policy matters and to establish a direction of travel for the plan. In February 2015 the Council consulted on ‘preferred approach’ versions of the full suite of Local Plan documents along with full interim SA/SEA Reports for each. Feedback received on the consultation was considered in the preparation of the plans and the SA/SEA. Details of feedback received and actions taken by the Council are set out in the corresponding Statement of Consultation reports (March 2015).
- 6.4. In January 2016 the revised Local Plan documents and associated SA/SEA Reports were subject to a further (Regulation 19) public consultation. Details of feedback received and the Council’s responses are set out in the corresponding Regulation 22(1)(c)(v) Statement of Consultation reports (May 2016). Following this round of public consultation, the Local Plan and final SA/SEA Reports were submitted to the Secretary of State for independent examination.
- 6.5. Through the public examination process a number of policy modifications were recommended by the Planning Inspector to ensure the Local Plan met the tests of soundness for local development documents. These ‘main modifications’ had not yet been through the SA/SEA process. An SA/SEA Addendum was therefore prepared to ensure due consideration was given to sustainability issues throughout the entirety of the plan process. Public consultation on the main modifications and the SA/SEA Addendum was undertaken in November 2016. There were no representations received to the Sustainability Appraisal of the main modifications.

## 7. Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

- 7.1. The SEA Regulations require that the significant environmental effects of the implementation the Plan should be monitored and that the SEA Adoption Statement should provide information as to the measures that are to be taken to monitor these effects.
- 7.2. The final SEA/SA Report (publication version) and Addendum (2016) highlighted the range of significant positive effects that had the potential to arise as a result of the implementation of the Local Plan, with no identified significant negative effects. A robust monitoring framework is in place to assess the effects of plan implementation, particularly to identify whether the predicted effects set out in the SA/SEA materialise over time.
- 7.3. The Local Plan monitoring framework is included in Appendix 3 of the Strategic Polices (2017). The framework is organised with targets and indicators under each of the 17 strategic policies within the plan. The framework is supplemented with bespoke monitors for the Tottenham AAP (as set out in Chapter 6 of the TAAP) and for Policy DM39 Warehouse Living (as set out in Table 7.2 of the DMDPD). The full complement of Local Plan monitors will enable any significant effects to be identified over the plan period and inform appropriate interventions or contingency measures to be considered where monitoring highlights significant negative effects, or where plan objectives are not being achieved.
- 7.4. The Council will report on implementation of the Local Plan through the Authority Monitoring Report process.

## 8. Additional information

- 8.1. This statement has been prepared in compliance with the requirements of Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004, Part 4 post-adoption procedures.
- 8.2. Haringey's Local Plan was adopted on 24<sup>th</sup> July 2017. The Local Plan and accompanying SA/SEA Report (including the SA/SEA Addendum) and a copy of this statement may be viewed free of charge at:
  - **Haringey Civic Centre**, Wood Green High Rd, N22 8LE (Opening hours Monday-Friday 9am-7pm)
  - **River Park House** Level 6, Wood Green N22 8HQ (Opening hours Monday-Friday 9am-430pm)
  - Or on the Council's website at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)

- 8.3. For further information on Haringey's Local Plan and supporting documents, and to view the full complement of SA/SEA reports, please visit the Council's planning webpages at [www.haringey.gov/localplan](http://www.haringey.gov/localplan)

## Appendix A – Haringey Local Plan SA/SEA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
<b>Social</b>		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> <li>• Encourage safety by design?</li> <li>• Reduce levels of crime?</li> <li>• Reduce the fear of crime?</li> <li>• Reduce levels of antisocial behaviour?</li> </ul>
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> <li>• Increase levels of participation and attainment in education for all members of society?</li> <li>• Improve the provision of and access to education and training facilities?</li> <li>• Ensure educational facilities are accessible to residential areas?</li> <li>• Enhance education provision in-step with new housing?</li> </ul>
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> <li>• Improve access to health and social care services?</li> <li>• Prolong life expectancy and improve well-being?</li> <li>• Promote a network of quality, accessible open spaces?</li> <li>• Promote healthy lifestyles?</li> <li>• Provide good quality outdoor sports facilities and sites?</li> </ul>
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> <li>• Reduce homelessness?</li> <li>• Increase the availability of affordable housing?</li> <li>• Improve the condition of Local Authority housing stock?</li> <li>• Improve the diversity of the housing stock?</li> <li>• Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character?</li> <li>• Create balanced communities of different affordable housing types, densities and tenures?</li> <li>• Create integrated, mixed-use tenure developments?</li> </ul>

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> <li>Promote a sense of cultural identity, belonging and well-being?</li> <li>Develop opportunities for community involvement?</li> <li>Support strong relationships between people from different backgrounds and communities?</li> </ul>
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> <li>Improve access to cultural and leisure facilities?</li> <li>Maintain and improve access to essential services (banking, health, education) facilities?</li> </ul>
<b>Economic</b>		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> <li>Retain existing local employment and create local employment opportunities?</li> <li>Diversify employment opportunities?</li> <li>Meet the needs of different sectors of the economy?</li> <li>To facilitate new land and business development?</li> </ul>
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> <li>Improve lifelong learning opportunities and work related training?</li> <li>Reduce high levels of unemployment and worklessness?</li> <li>Facilitate development of new and improved training facilities in high unemployment areas?</li> </ul>
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> <li>Improve physical accessibility to local and London-wide jobs?</li> <li>Support flexible working patterns?</li> <li>Encourage new businesses?</li> </ul>
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> <li>Enhance the environmental quality of the borough's town centres?</li> <li>Promote the borough's town centres as a place to live, work and visit?</li> <li>Ensure that the borough's town centres are easily accessible and meet local needs and requirements?</li> <li>Promote high quality buildings and public realm?</li> </ul>
<b>Environmental</b>		
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> <li>Protect and enhance biodiversity at designated and non-designated sites?</li> <li>Link and enhance habitats and wildlife corridors?</li> <li>Provide opportunities for people to access wildlife and diverse open green spaces?</li> </ul>

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> <li>Promote townscape character and quality?</li> <li>Preserve or enhance buildings and areas of architectural and historic interest?</li> </ul>
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> <li>Promote a network of quality, accessible open spaces?</li> <li>Address deficiencies in open space provision?</li> </ul>
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> <li>Preserve ground and surface water quality?</li> <li>Conserve water resources?</li> <li>Incorporate measures to reduce water consumption?</li> </ul>
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> <li>Encourage the development and remediation of brownfield land?</li> <li>Promote the efficient and effective use of land whilst minimising environmental impacts?</li> </ul>
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> <li>Reduce and manage flood risk from all sources?</li> <li>Encourage the inclusion of SUDS in new development?</li> </ul>
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> <li>Manage air quality within the borough?</li> <li>Encourage businesses to produce travel plans?</li> </ul>
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> <li>Minimise the impact of the ambient noise environment?</li> </ul>
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> <li>Minimise the use of energy?</li> <li>Increase energy efficiency and support affordable warmth initiatives?</li> <li>Increase the use of renewable energy?</li> <li>Mitigate against the urban heat island effect?</li> <li>Ensure type and capacity of infrastructure is known for future development?</li> </ul>
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> <li>Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)?</li> <li>Encourage the re-use of goods?</li> <li>Reduce the production of waste?</li> <li>Support the use of sustainable materials and construction methods?</li> <li>Increase the proportion of waste recycling and composting across all sectors?</li> </ul>

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> <li>• Improve the amenity and connectivity of walking and cycling routes?</li> <li>• Promote the use of public transport?</li> <li>• Reduce the use of the private car?</li> <li>• Encourage development in growth areas and town centres and reduce commuting?</li> </ul>